

EXHIBIT B

Declaration of Eugene Sapp

DECLARATION OF CHIEF EUGENE SAPP

I, Eugene Sapp, hereby state the following based upon my personal knowledge:

1. I am over the age of 18 years and competent to testify to the matters set forth in this Declaration.

2. I have personal knowledge of the facts set forth in this Declaration, and if called as witness, could competently testify to these facts.

3. I am currently the Chief of Unit Management at Nevada Southern Detention Center, which is owned and operated by CoreCivic pursuant to a correctional services agreement with the United States. I have been employed by CoreCivic since December 2011 and have held various positions. Currently, I am the Chief of Unit Management. I have held this position for 11 months.

4. I understand Petitioners allege that on May 27, 2020, I informed the G2 Unit population that “at least 60 to 70% of them had asymptomatic COVID-19 and that if they did not have more than 2 or 3 symptoms, including fever, they would not be tested.” (Dkt. 1 at ¶ 67.) I never made these statements. I am not a medical professional and would not have speculated as to which detainees were asymptomatic. Moreover, this alleged statement inaccurately describes CoreCivic’s COVID-19 testing protocol.

5. I understand Petitioners allege that on June 9, 2020, I told detainees “‘it is what it is’ in response to their protests that they had been exposed to a newly arrived infected individual who was not quarantined properly.” (*Id.* at ¶ 33.) This did not happen.

6. I understand Petitioners allege that on June 10, 2020, multiple G2 Unit detainees told me “that they would report the above exposure to their attorneys” and that I told them “I hope you have a good lawyer. I’ll be waiting for your lawsuit. Good luck with that.” (*Id.* at ¶ 34.) This conversation never occurred.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed on this day of September 15, 2020.

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5 CHIEF EUGENE SAPP
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